

Maintenance Management Plan

Fort St Vrain Independent Spent Fuel Storage Installation Maintenance Program

**Idaho
Cleanup
Project**

CH2M • WG Idaho, LLC is the Idaho Cleanup Project contractor for the U.S. Department of Energy

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1. PURPOSE

Provide a Maintenance Management Program (MMP) that will maintain safety, provide predictability, and extend the life of the Independent Spent Fuel Storage Installation (ISFSI) at Fort St Vrain (FSV) licensed to the Department of Energy (DOE) (Idaho Office) by the Nuclear Regulatory Commission (NRC).

To assure that facility safety is not compromised, safety is the highest priority of the program objectives. Assurance of facility safety is to be achieved through personnel executing the maintenance program using existing company procedures, best industry practice supplemented by improved facility condition monitoring, and inspection.

Maintenance activities are essential to achieve predictable facility performance. Achieving the goal of predictability will provide a high probability that the ISFSI will perform through its design life. Facility life extension is increased through preventive and corrective maintenance activities that extend rather than compromise a facility's anticipated life. Following existing and enhanced program requirements, procedures, and industry maintenance concepts will assure FSV facility life extension.

2. PROGRAM SUMMARY

2.1 Current Status of Implementation

The goal of the program is to balance corrective and preventive maintenance properly to provide a high degree of confidence that degradation to structures, systems, and components (SSC) important to safety is identified and corrected, that equipment life is optimized and that the maintenance program is cost effective. Preventive, predictive, and corrective maintenance will be used to ensure SSCs are available for their planned use. Maintenance work will be implemented through the use of the enhanced Technical Procedures (TPRs). The enhanced TPRs have been revised to include Aging Management Review (AMR) recommendations. The AMR was performed to evaluate current SSC conditions and determine actions needed to assure SSC functions through the duration of the license.

The specific Specification and enhanced implementing TPR for each SSC included in this MMP are contained in Appendix A, Maintenance Management Plan Implementation Cross Reference. Continued maintenance of the SSCs identified in this plan and Appendix A will assure the SSCs perform their function through the duration of the license.

A one time inspection of all SSCs important to safety and enhanced quality items included in the AMR was performed and will become the documented baseline for the condition of the SSCs. The inspection plan is contained in Appendix B, Aging Management Program One Time Inspection Plan.

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2.2 Structures, Systems, and Components (SSCs) Included in the Program

The Program includes those SSCs considered important to safety. The SSCs are identified in the ISFSI Safety Analysis Report (SAR), LST-28, “FSV ISFSI Classification Procedure and Q-List.” The following are the listed SSCs:

- Fuel Storage Containers
- Fuel Storage Container Support Stools
- Standby Storage Wells
- Container Handling Machine Raise/Lower Mechanism
- Container Handling Machine Fuel Storage Container Grapple
- Charge Face Structure Structural Steel
- Cask Load/Unload Port
- Structural Concrete of the MVDS Building (Enhanced Quality Item)
- Concrete Fill inside the Charge Face Structure (Enhanced Quality Item).

SSCs that are not important to safety will be maintained as needed or will be run to failure.

2.3 Periodic Inspection of Structures, Systems, and Components

Periodic inspections and preventive maintenance of the SSCs will be conducted according to the enhanced TPRs to determine whether degradation or technical obsolescence threatens safety or performance. Inspection and preventive maintenance methodology will be consistent with industry practice and will include identification of safety and health hazards.

A concrete inspector training and qualification program has been developed per ACI 349.3R-02. The TRAIN designation is QCNRCE01.

Repair/additional inspection of concrete and metal conditions exceeding second-tier criteria will be performed per ACI 349.3R-02.

The responsible manager at the completion of an inspection or preventive maintenance plans, schedules and implements corrective actions and ensures appropriate results are documented and reported following company procedures for tracking corrective actions and progress.

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Seasonal Facility activities will be performed to prevent equipment and building damage resulting from weather conditions.

Monitoring of area radiation and loose surface contamination levels at selected areas of the ISFSI is performed per TPR-5613, FSV ISFSI Radiation Survey and Vault Drain System Sample Collection and Analysis.

Weekly inlet and outlet cooling screen surveillance for obstructions is performed per TPR-5593, Visual Inspection of FSV ISFSI Cooling Inlets and Outlets/Tornado Clamp Verification.

2.4 Management Systems Controlling Maintenance and Other Organizational Interfaces

Maintenance program implementing standards, procedures, and guides identify the applicable interfaces between maintenance, operations, engineering, and other support organizations as applicable to the scope and purpose of each document.

2.5 Roles and Responsibilities

The facility organization manages and performs maintenance work, determines the condition of SSCs, identifies deficiencies and reports them to the responsible manager. They perform work in accordance with standards or procedures, evaluate the quality of maintenance performed, and specify maintenance support needs.

Applicable company procedures identify the assignment of roles and responsibilities. Some of the roles and responsibilities listed in company procedures will be accomplished by different positions and may be subcontracted.

The facility manager is responsible for selecting qualified personnel to perform the work and effectively using available resources. The facility manager is responsible to ensure work is completed in accordance with applicable procedures.

2.6 Maintenance Management Program Integration

2.6.1 Integrated Safety Management System

The work area organization supports Integrated Safety Management System (ISMS) through compliance with applicable company procedures and processes.

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2.6.2 Aging Management Program

The Aging Management Program (AMP) was a requirement for license renewal of the ISFSI. Aging Management Reviews (AMR) were completed as part of the AMP. The results of the AMR are summarized in tables contained in individual Engineering Design Files. The Maintenance Management Program manages the aging effects, or the relevant conditions that could lead to the aging effects, applicable to the subcomponent, and provides reasonable assurance that the integrity of the subcomponent will be maintained under current licensing basis conditions for the duration of the license.

2.6.3 Safety Basis Implementation

The Safety Basis implementation is through application of the “Fort St. Vrain Independent Spent Fuel Storage Installation Safety Analysis Report.”

The facility manager ensures, with the assistance of appropriate support personnel, that prerequisites and facility initial conditions are included in the development of maintenance work requests to ensure compliance with the safety basis. Prior to authorizing maintenance work, the facility manager performs a review of and verifies that facility-related initial conditions and prerequisites identified in the work request instructions are met.

2.6.4 Quality Assurance Program

The Quality Assurance Program (QAP) forming the bases for Quality Program Plan (QPP) PLN-466 is the QAP for the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI). The ISFSI QA Program is defined in Chapter 11 of the ISFSI Safety Analysis Report (SAR) and, incorporates by reference into the SAR, several sections of DOE/RW-0333P Quality Assurance Requirements and Description (QARD), Revision 10.

PLN-466 applies to SSCs and associated activities that are identified on the Q-List for the FSV ISFSI.

2.7 Configuration Management Process

Configuration Management is maintained through compliance with MCP-2811, “Nuclear Facility Change.”

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2.8 Prioritization Process

The periodicity of maintenance to be performed for each SSC is specified in Appendix A and is incorporated into the requirements of each SSC TPR.

2.9 Feedback and Improvement

The MMP utilizes the company-level processes to implement feedback at the worker level, using lessons learned, and the integrated assessment program. The MMP also uses the company-wide processes to manage issues and deficiencies to include development of appropriate corrective action plans.

2.10 Engineering Program

The company engineering process is utilized for engineer roles and responsibilities. PDD-1027, "Conduct of Engineering," defines the overall engineering program.

2.11 Maintenance History

Work performed on SSCs is entered into the Electronic Document Management System (EDMS). This information can be analyzed for equipment failures and trended for apparent causes of deficiencies. Maintenance history captured in EDMS can be used when planning subsequent work packages and for analyzing persistent problems, in order to determine corrective actions to prevent recurrence.

3. APPROVAL PROCESS

Authorization to perform maintenance work for each SSC is obtained from the facility manager.

The MMP will be reviewed and approved using the company document change control process.

4. CHANGE CONTROL

Major changes to the implementing documents require review of the MMP to ascertain if revision and approval is required. Revision to and approval of the MMP is accomplished using the company document change control process.

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5. DEFINITIONS

Enhanced Quality Item. The enhanced quality items do not form a primary or secondary containment boundary, prevent or control criticality, or prevent radioactive releases; however, the function they perform is considered important to the operation of the ISFSI and they receive a level of quality commensurate with their important function. The enhanced quality program was included in PSCo's FSV 10 CFR Part 50 Appendix B QA program. These items were not classified as important to safety (SAR section 3.4.1.2).

Enhanced TPR. A TPR that has been revised to include changes identified in the Aging Management Review. The changes provide the assurance the associated structure, system, component (SSC) will be maintained to provide design function through the renewed license time period.

Important to Safety. This is a 10 CFR Part 72 definition. Structures, systems and components important to safety mean those features of the ISFSI whose function is:

- To maintain the conditions required to store spent fuel or high level radioactive waste safely,
- To prevent damage to the spent fuel or high level radioactive waste container during handling and storage, or
- To provide reasonable assurance that spent fuel or high level radioactive waste can be received, handled, packaged, stored, and retrieved without undue risk to the health and safety of the public.

6. REFERENCE

29 Code of Federal Regulations (CFR) Part 1910.179, j and l

10 CFR Part 72

LST-24, "Conduct of Operation Conformance Matrix (NRC Regulated Facilities)"

PDD-600, "Site Maintenance Management Program"

PLN-466, "Quality Assurance Program Plan For ISFSI Management"

PLN-601, "Maintenance Implementation Plan"

PRD-600, "Maintenance Management Requirements"

362F0152 Technical Specification Fort St Vrain Maintenance, Inspection & Monitoring Requirements

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Fort St. Vrain Independent Spent Fuel Storage Installation Safety Analysis Report

Fort St. Vrain Independent Spent Fuel Storage Installation Technical Specifications

ORNL/TM-12701 Guidance for the Design and Management of a Maintenance Plan to Assure Safety and Improve the Predictability of a DOE Nuclear Irradiation Facility

7. APPENDIXES

Appendix A, Maintenance Management Program Implementation Cross-Reference

Appendix B, Aging Management Program One Time Inspection Plan

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Appendix A

Maintenance Management Program Implementation Cross-Reference

The following table includes the cross-reference of the Technical Specification and the enhanced Technical Procedure Requirements (TPR) that implement the maintenance activities for the “Important to Safety” and “Enhanced Quality Item” structures, systems, and components (SSCs) for the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI).

SSC Important To Safety	TS/SAR/GEC Requirements/Aging Management Activity	Method of Implementation	Periodicity of Maintenance
Fuel Storage Containers, Drawing Number 362A0066	GEC Technical Specification Section 6.1.2 Representative leak testing will only be carried out to demonstrate the integrity of the FSC lid seals.	TPR-5604, “FSV ISFSI Fuel Storage Container O-Ring Vacuum Leak Test”	
	Technical Specification Surveillance Requirement (SR) 3.3.1.1	Periodic leak test every 5 years	Every 5 years
	Aging Management Activity, EDF-8612 (enhanced requirements):	Time Limited Aging Analysis (TLAA) per EDF-9166	
	Visual inspection of vaults every 10 years per SAR 9.8	TPR-7812, “Inspection of FSV Fuel Storage Containers and Support Stools” Periodic inspection every 10 years. Perform visual inspection of vaults by July 2017	Every 10 years
	Sample the gas inside one FSC in each vault for hydrogen - the same 6 FSCs scheduled for seal leak testing - per SAR 9.8	TPR-6493, “Fort St. Vrain Fuel Storage Container Gas Sample/Vacuum Purge Procedure” Sample no later than June 2015	One time sample, unless results dictate additional sampling

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SSC Important To Safety	TS/SAR/GEC Requirements/Aging Management Activity	Method of Implementation	Periodicity of Maintenance
Fuel Storage Container Support Stools	NOTE: <i>Support stools are not accessible for maintenance.</i>		
	Aging Management Activity; EDF-8612 (enhanced requirements):	Time Limited Aging Analysis TLAA per EDF-9166	
	Visual inspection of vaults every 10 years per SAR 9.8	TPR-7812, “Inspection of FSV Fuel Storage Containers and Support Stools” Periodic inspection every 10 years. Perform visual inspection of vaults by July 2017	Every 10 years
	Visual inspection of CFS underside (vault ceiling) and vault wall and floor surfaces every 10 years per SAR 9.8	TPR-7812 Periodic inspection every 10 years. Perform visual inspection by July 2017	Every 10 years
Standby Storage Wells, Drawing Number 362A0060	GEC Technical Specification Section 6.1.3.1 Standby Storage Wells (SSW)	TPR-5590, “Inspection of FSV ISFSI Standby Storage Wells”	
	Aging Management Activity EDF-8710 (enhanced requirements):	Inspection not less than every 12 months per TPR-5590	Annually
	Clean inside SSW	Time Limited Aging Analysis (TLAA) per EDF-9194	As needed
	Periodically test seal integrity per SAR 9.8	TPR-5598, “FSV ISFSI Storage Well O-Ring Leak Test”	Every 5 years at the same time the FSCs are leak tested

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SSC Important To Safety	TS/SAR/GEC Requirements/Aging Management Activity	Method of Implementation	Periodicity of Maintenance
Container Handling Machine Raise/Lower Mechanism, Drawing Number 362A0252	GEC Technical Specification Section 6.1.7.2 CHM Raise/Lower Mechanism	TPR-5605, “Inspection of FSV ISFSI Container Handling Machine Raise/Lower Mechanism”	
	Aging Management Activity EDF-8348 (enhanced requirements)	Periodic monthly and annual inspections per TPR-5605	
	GEC Technical Specification Section 6.1.7.2.1 Monthly visual inspections during loading/unloading of MVDS	Inspection per TPR-5605	Monthly when required
	GEC Technical Specification Section 6.1.7.2.2 Annual visual/functional inspections during storage period or following a tornado or seismic event	Inspection per TPR-5605	Annually
	GEC Technical Specification Section 6.1.7.2.3 Preventive Maintenance Program (29 CFR part 1910.179 (l))	Preventive maintenance per TPR-5605	Annually
Container Handling Machine Fuel Storage Container Grapple, Drawing Number 362A0253	GEC Technical Specification Section 6.1.7.3 FSC Grapple	TPR-5609, “Inspection of FSC Grapple”	

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SSC Important To Safety	TS/SAR/GEC Requirements/Aging Management Activity	Method of Implementation	Periodicity of Maintenance
	Aging Management Activity EDF-8529 (enhanced requirements)	Periodic inspection not less than every 6 months per TPR-5609	Semi annually
	Visual inspection not less than every 6 months	Inspection per TPR-5609	Semi annually
	GEC Technical Specification Section 6.1.7.3.1 Preventative Maintenance Program (29 CFR part 1910.179 (l))	Preventative maintenance not less than every 6 months per TPR-5609	Semi annually
	Storage requirements are per ANSI N45.2.2 1972 Level B	Storage inspection not less than every 6 months per TPR-5609	Semi annually
Charge Face Structure Structural Steel	GEC Technical Specification Section 6.1.1 Vault Module and Charge Face Structure	TPR-5608, “Inspection of FSV ISFSI Vault Modules And Charge Face Structure”	
	Aging Management Activity EDF-8519 (enhanced requirements)	Periodic inspection not less than every 12 months or following tornado or seismic event per TPR-5608	Annually
	Visual inspection not less than every 12 months or following tornado or seismic event	Inspection per TPR-5608	Annually
Cask Load/Unload Port, Drawing Number 362A0095	GEC Technical Specification Section 6.1.4 Cask Load/Unload Port (CULP)	TPR-5610, “Inspection of FSV ISFSI Cask Load/Unload Port Shutter, Hatch Cover and Adapter Plate”	
	Aging Management Activity EDF-8541 (enhanced requirements)	Periodic inspection not less than every 5 years or following tornado or seismic event per TPR-5610	Every 5 years

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SSC Important To Safety	TS/SAR/GEC Requirements/Aging Management Activity	Method of Implementation	Periodicity of Maintenance
	Visual inspection not less than every 5 years or following tornado or seismic event	Inspection per TPR-5610	Every 5 years
	GEC Technical Specification Section 6.1.4.1 CLUP Shutter Fabrication	Inspection per TPR-5610	Every 5 years
	GEC Technical Specification Section 6.1.4.2 CLUP Hatch Cover & Adaptor Plate	Inspection per TPR-5610	Every 5 years
	GEC Technical Specification Section 6.1.4.3 CLUP TC Supports	TPR-5599, “Inspection of FSV ISFSI Cask Load/Unload Port, Spent Fuel Shipping Cask Supports, and Seismic Restraints”	
	Aging Management Activity EDF-8541 (enhanced requirements)	Periodic inspection not less than every 12 months or prior to further service per TPR-5599	Annually
	Visual inspection not less than every 12 months or prior to further service	Inspection per TPR-5599	Annually
Structural Concrete of MVDS Building (Enhanced Quality Item)	GEC Technical Specification Section 5.1.3 Concrete	TPR-5589, “Inspection of FSV ISFSI MVDS Building”	
	Aging Management Activity EDF-8672 (enhanced requirements)	Periodic inspection not less than every 5 years or following tornado or seismic event per TPR-5589	Every 5 years

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SSC Important To Safety	TS/SAR/GEC Requirements/Aging Management Activity	Method of Implementation	Periodicity of Maintenance
	Visual inspection not less than every 5 years or following tornado or seismic event	Inspection per TPR-5589	Every 5 years
	Visual inspection of accessible MVDS concrete, including below grade concrete if exposed during excavation, per SAR 9.8	Inspection per TPR-5589	Every 5 years
	Visual inspection of exposed steel embedments and attachments per SAR 9.8	Inspection per TPR-5589	Every 5 years
Concrete Fill inside the Charge Face Structure (Enhanced Quality Item)	GEC Technical Specification Section 1.1.1.1 Vault Module NOTE: <i>Concrete fill is not accessible for maintenance.</i>	TPR-5608, “Inspection of FSV ISFSI Vault Modules and Charge Face Structure,” and TPR-5589, “Inspection of FSV ISFSI MVDS Building”	
	Aging Management Activity EDF-8520 (enhanced requirements)	Inspections per TPR-5608 and TPR-5589	Annually and every 5 years respectively

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Appendix B

Aging Management Program One Time Inspection Plan

The following table includes the one time inspection aging management activities to be completed for the “Important to Safety” and “Enhanced Quality Item” structures, systems, and components (SSCs) for facility life extension of the Fort St. Vrain (FSV) Independent Spent Fuel Storage Installation (ISFSI).

SSC Important To Safety	Aging Management Activity	Method of Implementation
Fuel Storage Containers	Representative leak testing of the FSC lid seals. (EDF-8612)	TPR-5604 (June 2010)
	Inspection (EDF-8612)	Time Limited Aging Analysis (TLAA) EDF-9166 TPR-7812 (February 2008)
Fuel Storage Container Support Stools	Inspection (EDF-8612)	Time Limited Aging Analysis (TLAA) EDF-9166 TPR-7812 (February 2008)
Standby Storage Wells	Inspection (EDF-8710)	TPR-5590 (June 2009)
	Clean inside SSW (EDF-8710)	Time Limited Aging Analysis (TLAA) EDF-9194 (February 2009)
Container Handling Machine Raise/Lower Mechanism	Inspection (EDF-8348)	TPR-5605 (June 2010)
Container Handling Machine Fuel Storage Container Grapple	Inspection (EDF-8529)	TPR-5609 (June 2010)

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SSC Important To Safety	Aging Management Activity	Method of Implementation
	Preventive Maintenance (EDF-8529)	TPR-5609 (June 2010)
	Storage inspection	TPR-5609 (June 2010)
Charge Face Structure Structural Steel	Inspection (EDF-8519)	TPR-5608 (June 2010)
Cask Load/Unload Port	Inspection (EDF-8541)	TPR-5610 (June 2010)
	Inspection (EDF-8541)	TPR-5599 (June 2010)
Structural Concrete of MVDS Building (Enhanced Quality Item)	Inspection (EDF-8672)	TPR-5589 (July 2009)
Concrete Fill inside the Charge Face Structure (Enhanced Quality Item)	No requirements, recommends facility and SSC inspections continue (EDF-8520)	TPR-5608 (June 2010) TPR-5589 (July 2009)